

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MARGARITA GONZALEZ,

Case No. 2:18-cv-04415

Plaintiff,

- against -

TALON AIR INC. AND ADAM KATZ,

Defendants.
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DEFENDANTS' INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of The Federal Rules of Civil Procedures, defendants Talon Air, Inc. ("Talon Air") and Adam Katz (collectively, "Defendants"), by their attorneys, Westerman Ball Ederer Miller Zucker & Sharfstein, LLP, make the following Initial Disclosures in the above-captioned matter.

Defendants reserve the right to revise, withdraw, and/or supplement these disclosures. By making these disclosures, Defendants do not represent that they are identifying every document, tangible thing, or witness possibly relevant to this lawsuit. Further, Defendants make the following disclosures without waiving, intentionally or otherwise, their right to object to the production of any document or tangible thing on the basis of any privilege, the attorney work-product doctrine, privacy, competency, relevancy, materiality, undue burden, or any other valid objection. Rather, Defendants have made a good faith effort to identify information subject to the disclosure requirements of Fed. R. Civ. P. 26(a)(1). Finally, Defendants' disclosures are made expressly without waiving, *inter alia*: (1) the right to object to the use of any such information for any purpose, in whole or in part, at any subsequent stage or proceeding in this or any other action; and (2) the right to object on any and all grounds, at any time, to any other discovery proceeding involving or relating to the subject matter of these disclosures.

Subject to the foregoing, Defendants provide the following information:

A. INDIVIDUALS, WHOSE IDENTITIES ARE CURRENTLY KNOWN TO DEFENDANTS, THAT ARE LIKELY TO HAVE DISCOVERABLE INFORMATION THAT DEFENDANT MAY USE TO SUPPORTS THEIR CLAIMS OR DEFENSES, UNLESS SOLELY FOR IMPEACHMENT

Below are the witnesses Defendants identify at this time. Defendants reserve their right to supplement their disclosures.

1. Peter Cipriano
President and Chief Financial Officer
Talon Air, Inc.
c/o Counsel for Defendants

Mr. Cipriano has knowledge about Plaintiffs' job performance, duties, hours, compensation, and termination. He also has knowledge concerning Talon Air's operations, policies, practices and procedures.

2. Jason Dantonio
Supervisor
Talon Air, Inc.
c/o Counsel for Defendants

Mr. Dantonio has knowledge about Plaintiffs' job performance, duties, hours, compensation, and termination. He also has knowledge concerning Talon Air's operations, policies, practices and procedures.

3. Plaintiff.
4. Any witnesses disclosed by the parties during the course of discovery.

B. NON-PRIVILEGED, DISCOVERABLE DOCUMENTS AND THINGS OF WHICH DEFENDANT ARE CURRENTLY AWARE, WHICH ARE IN THEIR POSSESSION, CUSTODY OR CONTROL, AND WHICH IT MAY USE TO SUPPORT THEIR CLAIMS OR DEFENSES, UNLESS SOLELY FOR IMPEACHMENT

1. Plaintiff's personnel files.
2. Plaintiff's compensation and time records.
3. Policies and procedures, including employee handbooks, relating to, among other things, wage and hour issues.
4. Documentation regarding Plaintiff's job duties and responsibilities.
5. Documents regarding the business operations of Talon Air.
6. Documentation regarding work that Plaintiff performed for Talon Air.
7. Documents produced by Plaintiff in this matter.

8. Documents identified in Plaintiff's Initial Disclosures.

C. COMPUTATION OF DAMAGES CLAIMED BY THE DISCLOSING PARTY

N/A


D. INSURANCE AGREEMENTS

N/A

I hereby certify that to the best of my knowledge, information and belief, formed after an inquiry that was reasonable under the circumstances, this disclosure is complete and correct as of this date.

Dated: Uniondale, New York
October 22, 2018

WESTERMAN BALL EDERER MILLER
ZUCKER & SHARFSTEIN, LLP

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